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May 6, 2015
TRC Solutions Project No. 192355

Mr. Gary Moore
U.S. EPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

**Re: Weekly Progress Report
Falcon Refinery Superfund Site
Ingleside, San Patricio County, Texas
TXD 086 278 058**

Dear Mr. Moore:

On behalf of Lazarus Texas Refinery I, LLC, (Lazarus), TRC Solutions (TRC) submits this Weekly Progress Report on the Removal Action Activities at the Falcon Refinery Federal Superfund Site to the United States Environmental Protection Agency for your review.

While the Coastal Bend received record amounts of rain on Monday 16, 2012 Lazarus will continue to move forward with the Removal Action at the site with the plan and schedule that is provided below.

If you have any questions, comments, or concerns, please do not hesitate to contact me at (361) 522-1935.

Sincerely,
TRC

Alonzo G. Arredondo
Senior Geologist

Attachment: Weekly Progress Report
cc: Lazarus Texas Refinery I, LLC

WEEKLY PROGRESS REPORT - Falcon Refinery Federal Superfund Site, Ingleside, TX;

1. TASKS NECESSARY TO COMPLETE THE REMOVAL ACTION

- Butane Tank – This tank contains less than one gallon of sludge. It will be cleaned, the sludge will be disposed of appropriately, and the tank will be inspected.
- Tank 12 – The three inches of oil that remain in this tank will be removed when the collapsed roof is removed.
- Tank 7 – The three feet of sludge that remain in this tank will be removed when the collapsed roof is removed.
- Tank 30 – The two feet of water and sludge that remain in this tank will be removed when the collapsed roof is removed.
- Tank 26 – This tank requires the removal of liquids and sludge and will be demolished after cleaning.
- Facility Pipes – The pipes that contain material will be carefully handled to allow for the removal of the contents within them.

2. THE SCHEDULE OF ACTIVITIES TO COMPLETION DATE (September 28, 2012)

- Tank 12 – Cut door, remove internal floating roof, oil and conduct API 653 tank inspection. April 9, 2012
- Tank 30 – Cut door, remove internal floating roof, water, and paraffin. April 11, 2012
- Tank 7 – Cut door, remove internal floating roof, and paraffin. April 11, 2012
- Butane Tank – Completely clean and inspect the vessel. April 23, 2012
- Tank 26 – Install treatment system, construct irrigation field, treat water, reclaim oil, centrifuge sludge and dispose of residual solids at U.S. Ecology. April 9, 2012
- Facility Pipes – The material in the facility piping will be removed as the vessels and connecting pipelines are demolished.

3. PROJECT ACTIVITIES COMPLETED THIS REPORTING PERIOD (APRIL 16 - 20, 2012)

Lazarus conducted the following activities this week:

- Lazarus completed mowing the grass on the irrigation fields.
- Lazarus completed the construction of the irrigation field berms.
- Lazarus began to lay out the pipe for the irrigation system.
- Lazarus is 75% complete with removal of the roof from Tank 12.
- Lazarus resurfaced the pad in the former Tank 27 area to manage and remove rainwater that had accumulated in the area.
- Lazarus began mowing and clearing vegetation to facilitate access to piping in the NW property and Process Areas 1 and 2 of the refinery.
- Lazarus procured additional engineering services and began assessing and identifying piping along the NW property of the site.
- Lazarus began brush removal along the property outside the facility.
- Lazarus continues to clean, segregate and load clean roof from Tank 12.
- Lazarus continues to transfer water from Tank 30 into frac tanks.
- Lazarus repaired facility roads and firewalls.
- Lazarus has requested a proposal for the development of a Spill Prevention Plan for the site.

4. ACTIVITIES PLANNED FOR NEXT WEEK (APRIL 23 – 27, 2012)

- Lazarus will continue evaluating water samples from Tank 26 and prepare a treatment program for the water, oil and sludge.
- Lazarus will continue transferring liquids from Tank 30 into a frac tank.
- Lazarus will continue and complete cutting and cleaning the internal floating roof in Tank 12.
- Lazarus will start removal of sludge in tank 12 after Wednesday April 25, 2012.
- Lazarus will continue to conduct general housekeeping at site by having a contractor pick up fiberglass from the Tank 10 area and at several firewalls.
- Lazarus will continue evaluating the discharge limits for treated wastewater and pursue agreement from U.S. EPA and TCEQ.

5. ACTIVITIES PLANNED FOR WEEK FOLLOWING (APRIL 30 – May 4, 2012)

- Lazarus will start removal of the roof walkway from Tank 30 with a crane.
- Lazarus will cut top of Tank 7 / Remove cone roof and floating roof with a crane.

6. ISSUES ENCOUNTERED

- Lazarus has been able to resolve the issue with improving clarity to the water from Tank 26.